

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590

Reply to the Attention Of:
SR-6J

April 2, 2010

Via E-mail and Certified Mail

Richard Gay
Weyerhaeuser Company
810 Whittington Ave.
Hot Springs, AR 71901

RE: Remedial Action Work Plan
12th Street Landfill, Kalamazoo River Superfund Site Operable Unit #04
Plainwell, Michigan

Dear Mr. Gay:

The United States Environmental Protection Agency (EPA) reviewed Weyerhaeuser's March 2010 Remedial Action Work Plan (RAWP) for *12th Street Landfill, Kalamazoo River Superfund Site Operable Unit #04, Plainwell, Michigan*. Pursuant to the Consent Decree for the Design and Implementation of Certain Response Actions at Operable Unit #4 and the Plainwell Inc. Mill Property of the Allied paper, Inc/ Portage Creek/Kalamazoo River Superfund Site, Civil Action No. 1:05CV0003 (2005), EPA conditionally approves the RAWP provided that Weyerhaeuser make the following changes to the RAWP.

Specific Comments

1. Page 2, third paragraph – “emergency response action” should read emergency action.
2. Page 2, third paragraph – “... between the river and the landfill.” Insert, “to allow for monitoring at the GSI.”
3. Section 2.0 – Figure 1.3 referenced here is dated January 2010; Design Drawing C-02 is dated March 2010. These figures look to be identical, but, please correct the date reference and confirm that these figures are the same.
4. Section 2.1 – This list of RA contractor plan submittals is not complete; this list only incorporates plans required in the specifications. The sampling procedures for wastewater that may be required (Section 4.2.7) are, for example, a submittal not identified here. Please add text clarifying that this section only consists of some, not all, RA contractor submittals.
5. Section 2.1 – Identify any plans the RA contractor will develop to ensure the substantive requirements of environmental permits will be met.
6. Section 2.1 – Suggest the Seeding and Erosion Control Plan be submitted 30 days prior to placing topsoil to allow for Agency review.

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7. Section 2.2 and 2.2.1 – Add the geotechnical engineer referenced in Section 6.3.3 of the Design Report to these sections.
8. Section 4.2.10 – Discuss the underground Major Gas Pipeline and arrangements made to date regarding the pipe in this section.
9. Page 23 – Beginning here, the references to the design drawings do not contain the phrase “of the final Design Report”. Given how extensively the design drawings are referenced in Section 4.3, consider adding the design drawings to the RAWP as an appendix.
10. Section 4.3.1 - At what point will CRA/CRA services identify if water will be treated onsite or disposed offsite?
11. Figure 2.1 – Identify (dotted line) CRA contact for oversight contractor in the field.
12. Section 6.2.1 – Add the CRA Geotechnical Engineer as an attendee of this meeting.
13. Figure 1.4 and 2.1, Table 1.1 – Add the CRA Geotechnical Engineer to these figures and tables.
14. Global Change – The EPA Remedial Project Manager is Michael Berkoff.

If you have any questions about this letter, please contact me at (312) 353-8983.

Sincerely,



For Michael Berkoff
Remedial Project Manager

cc: J. Saric EPA
L. Kirby-Miles EPA
S. Chummar EPA
T. Prendiville EPA
S. Borries EPA
R. Frey EPA
P. Bucholtz MDEQ
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